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AUTHOR Hankin, Joseph N.
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ABSTRACT

This article on accreditation includes a definition, historical background, and discussion of the various forms of accreditation with their resultant problems. Differences are brought out between regional or general, specialized, state, and federal accreditation. An important question is raised about how specialized and general accreditation can operate most effectively together. Other questions raised concern: program vs. institutional accreditation; proliferation; costs; autonomy and uniformity; evaluation process, standards, and criteria; board membership; and governmental participation. The American Association of Junior Colleges supports the national commission on accrediting policy, which emphasizes the central and important role of regional associations. (CA)

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"Quo Vadis Specialized Occupational Program Accreditation?"

by Joseph N. Hankin, President
Harford Junior College, Bel Air, Maryland

Accreditation has long been recognized as an instrument for: the maintenance of higher educational standards among institutions and their programs of study; protection of society and institutions from low quality practitioner's, programs, and institutions; protection from inappropriate external forces; and so on. Accreditation is not to be confused with licensure, registration, certification and similar functions; generally, the term accreditation is used to denote program and institutional approval, whereas these other terms refer to an assessment of an individual's competence in a given area.

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Accrediting agencies and bodies engage in the establishment of standards or criteria; institutional and program evaluation to determine whether or not the standards are met; publication of a list of institutions and programs that meet these criteria, and periodic reviews to establish whether the institutions and programs continue to meet these standards.

These accrediting bodies fall into the four major categories: General or Regional; Specialized; Federal; and State.

After giving a few historical notes, we shall pass on to the several problems which have been raised over the general issue, and finally, we shall conclude with a widely suggested solution for consideration and discussion by those present.

The process of certifying secondary schools practiced in the late 1890's was broadened to include the concept of accrediting colleges and universities beginning in 1912 when the North Central Association first published its list of accredited colleges, followed by its list of accredited junior colleges in 1917. The Northwest

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Association followed suit in 1918, joined by the Southern Association in 1925. Although two colleges from the Middle States region were listed in the first Junior College Directory in 1930 as being accredited, the Middle States Association, which began accrediting activity in 1921, did not officially recognize junior colleges until 1932. Earlier in the century, the Northwest Region accredited some California institutions, but by 1948, the Western Association began accrediting activity and in 1952, a commission on junior colleges was formed in that region. The last of the associations was the New England Association which began to accredit both junior and senior colleges in 1954.

Progress was slow with respect to the regional accreditation of junior colleges in America; in 1930 only 73 of the 436 junior colleges listed in the 1930 Junior College Directory were regionally accredited. More than half of these were to be found in the North Central Association alone. By 1940, 148 two-year colleges had received accreditation out of a total of 610 institutions and all but 36 of the colleges were to be found in two of the regions, the Southern and North Central. By 1950, 222 or over one-third of the total 622, had undergone accreditation. Today, in 1970, some 713 institutions found in the 1970 Junior College Directory out of 1,038 are accredited. Thus, the period 1950-1970 saw the greatest activity in regional accreditation of community and junior colleges.

The approaches by the regional associations vary considerably. For example, some of the regional associations place all post-secondary education in a commission of higher education. Others divide the responsibility among commissions on secondary schools and higher education depending upon whether or not the institution offers an associate degree. Others have separate, special committees on occupational education for institutions where degrees are not offered, and still others have special junior college divisions.

No brief history of regional accreditation is complete without reference to the Federation of Regional Accrediting Commissions of Higher Education which works toward the coordination of the institutional or general type of accreditation carried out by the regional associations.

Turning from general or regional accreditation to specialized accreditation we find that practitioners in a specialized field have attempted to protect themselves from undue competition from unqualified practitioners by supporting programs of accreditation in which minimally adequate educational offerings are given public recognition and approval by his professional body which, in his view, comprises the only individuals who are capable of judging an adequate educational program for his profession. A prime case in point would be the medical profession which has become so sub-divided and specialized in recent years with the addition of numerous para-medical and semi-professional occupations. Even though medical functions are delegated to para-medical personnel, they are performed under the direction and supervision of a physician and the physician has a vested interest in knowing that these assistants are qualified to perform the particular procedures in order to prevent harm to the patient and liability suits involving the physician.

The medical profession is a good example, inasmuch as specialized accreditation may be said to have begun with this profession. Although organized in 1846, the American Medical Association did not publish its first list of approved medical schools until 1906-1907. Proliferation of medical schools operating with marginal facilities and faculties led to a study of medical education conducted by Abraham Flexner, and his 1910 report resulted in the formation of a committee on medical education to serve as a professional standards body, followed by the eventual closing of approximately half of the more than 160 medical schools which were in operation in 1906. Subsequent accrediting bodies were established for dental education in 1918, legal education in 1923, and engineering in 1936. No longer would it be said that

"The learned professions, all agree,
Are physics, law, and divinity."

With respect to specialized accreditation and the junior college, activity began in 1944 as the Engineers Council for Professional Development (ECPD) established a framework for accrediting technical institute programs. The National League for Nursing began to accredit A D N programs soon after they appeared in community colleges in 1952. Several others followed suit in the 1950's and 1960's. In other words, the height of activity and growth of regional accreditation was accompanied by the beginning and development of specialized accreditation.

The GI Bill saw many veterans returning and enrolling in the community colleges and, as programs of training began to diversify, specialized accreditation became a topic for examination. At about this same time in 1948, the American Association of Universities decided to terminate its accrediting role and the American Association of Junior Colleges voted (in 1951) with other associations to join as a constituent member of the National Commission on Accrediting which had been formed in 1949. More will be written with respect to both the NCA and the AAJC in a few paragraphs below.

The question of whether or not community colleges have participated widely in the accrediting activities of these specialized agencies is an interesting one. Some conclude that with the exception of a few of the para-medical specialties and some of the engineering fields, specialized accreditation is not widely sought by public community colleges. A recent study by Charles F. Ward shows that of 31 specialized accrediting agencies, only 9 (Accrediting Commission for Business Schools, American Association of Nurse Anesthetists, American Dental Association, American Medical Association, ECPD, National Association for Practical Nurse Education and Services, National Association of Trade and Technical Schools, National Home Study Council, and National League for Nursing) accredit curricular programs or institutions of an occupational nature, including community colleges; another study by Lloyd Messersmith and Leland Medsker indicates that of a total of 28 organizations recognized by the National Commission on Accrediting to accredit specific programs, only 5 have accredited community college programs, as late as 1967 (Council on Dental Education, ECPD, Council on Medical Education, National Association of Schools of Music, National League for Nursing). Lloyd Messersmith, in his doctoral dissertation, showed that of the 837 junior colleges listed in the 1967 American Association of Junior Colleges' Directory, 102 have one or more programs accredited (representing 181 programs).

Despite this apparent slow increase, some see any increase at all as threatening. They point to the fact that the NCA recognized an additional 14 accrediting agencies during the 1960's and that the number of individual programs with specialized accreditation grew from 3,060 to 4,140 during the period 1960-1970.

Nonetheless, most feel that if regional accreditation came slowly, then the accrediting of specific programs came even more slowly. Concern over proliferation of agencies accrediting specialized programs seemed based more on what might theoretically happen than what was actually happening.

Two short notes should be added here about the National Commission on Accreditation and the American Association of Junior Colleges: Both are against proliferation of specialized accreditation agencies. It can hardly be said that the National Commission on Accrediting is against the establishment of specialized accrediting agencies inasmuch as it was founded in 1949 as a successor to the Joint Committee on Accrediting of the American Association of Universities. Among its responsibilities is to define the accrediting responsibility of the several agencies, prepare and distribute a list of accrediting agencies whose policies and procedures are acceptable (NCA currently recognizes some 34 agencies in 32 fields; the U. S. Office of Education recognizes an additional 7), and several other important responsibilities but ones not directly related to the specific question before us now. The NCA has come out strongly against undue proliferation, as it did when the American Historical Association sought to establish a list of approved doctoral programs, or as it has against the possibility of 50 separate state agencies. Indeed, the NCA, using the "will society be harmed..." test, has indicated that there are numerous fields which do not require accreditation of a specialized nature. In response to mounting pressures, the National Commission on Accrediting has created an interim council on accreditation of occupational and specialized education. In May of 1969, this Council proposed that the six regional associations "adopt a plan of categorical accreditation for institutions offering both academic and vocational-technical programs, and that each category be the responsibility of a separate commission." Running counter to the Regional Association's traditional institution-wide approach, this proposal to date has failed to receive the endorsement of the Regional's Federation of Regional Accrediting Commissions for Higher Education.

At its 1961 Convention, the American Association of Junior Colleges' membership passed a resolution requesting the National Commission on Accrediting to study the accreditation of junior colleges by specialized agencies and urging member institutions to confine accrediting relationships to the regional associations and the official state approving agencies.

By late 1964, not only the American Association of Junior Colleges, but the National Commission on Accrediting, the American Vocational Association, the United States Office of Education, and the newly organized Federation of Regional Accrediting Commissions of Higher Education, had all taken cognizance of the problem and had either passed resolutions or issued policy statements concerning this issue.

Accreditation has been primarily a voluntary, non-governmental task in America. The Federal Government, despite an attempt of the United States Bureau of Education to issue a public classification of colleges during President Taft's Administration, has been relatively quiet (unlike other national governments and ministries of education) until recently.

The GI Bill of 1952 assigned to the United States Commissioner of Education responsibility to determine which accrediting agencies are appropriate for judging the quality of institutions in which federally financed students might enroll, posing a particular problem in occupational education because no single accrediting agency or cluster of agencies provided the nation-wide information which, by law, the United States Office of Education seemed to require.

Prior to 1960 the Federal Government contributed approximately $50 million a year to all vocational education. However, this was quickly raised when in 1963 the Vocational Education Act was passed and amended in 1968, providing authorizations reaching a level of about $910 million by 1973. Thus, within the 1960-1970 decade, the Federal contribution to vocational education, a large portion of which is earmarked for post-secondary schools, increased some 18-fold. In addition, the Federal Government has provided funds under the Manpower Development Training Act of 1962, the Allied Health Professions Personnel Training Act of 1963, the Nurses' Training Act of 1964, the Higher Education Act of 1965, the Economic Opportunity Act of 1965, and the Health Manpower Act of 1968. Many of these acts allocate funds directly to individual institutions and in order to provide some degree of assurance that these funds are allocated only to institutions meeting minimum educational standards Congress has included provisions within the acts to the effect that institutions are eligible recipients only if they are accredited by a nationally recognized accrediting agency. This was important because previous legislation such as the GI Bill had required accreditation by a body or bodies (but this could be interpreted to be a regional accrediting agency, a state accrediting or licensing body), as well as recognition by the U. S. Office of Education. But the Health Professions Educational Assistance Act of 1963 chose a specialized accrediting agency as did the Nurse Training Act of 1964. Approximately 30 categories of Federal assistance to public institutions, as provided by 8 laws enacted since 1963 alone, require accreditation by these "recognized" agencies as a prerequisite for the allocation of federal funds.

Other Federal agencies such as the Department of Labor, the Office of Economic Opportunity, the Veterans Administration, and the Federal Aviation Agency also require evaluation of occupational education but with no clear pattern yet being set. That is, some rely on the Office of Education's list, some rely on state approving agencies, some operate their own program of certification and licensing, and so forth.

We should not leave the subject of Federal influence without referring to a report published in October, 1970 by the President's Task Force on Higher Education. This report calls for the formation of a National Academy of Higher Education federally chartered and modeled after the National Academy of Sciences. According to the Report the Academy should study all matters regarding

higher education of major concern to the American people and to our colleges and universities. As a primary responsibility, such an Academy "would keep clearly before the nation and its legislative and governmental agencies, the necessity of maintaining the quality of the educational experience as a continuing priority that must not be sacrificed as opportunities in higher education are quantitatively increased."

State programs of accreditation, evaluation and approval are not much different from regional programs although the states vary measurably from one to another with respect to whether or not they operate formal programs of institutional accreditation. As states spend more and more on occupational education, it may safely be assumed that they will become or wish to become more and more involved in these activities. For example, in 1968 the National average showed that states spent $3.65 for each $1.00 of Federal funds under the Vocational Education Act of 1963 with the 1968 amendments.

By way of summary of this brief history, we have been speaking of differences between regional and specialized accreditation (we might say that regional accreditation is, in essence, controlled by the institutions themselves, whereas specialized accreditation has developed outside the institution as an outgrowth of the desire on the part of the professional association to participate in quality control). We have also discussed the difference between regional and specialized accreditation on the one hand, and Federal and State accreditation on the other (the former two being voluntary, non-governmental functions, and the latter, of course, governmental).

Let us now turn to the problems which these various forms of accreditation raise which is, of course, the meat of our discussions today.

1. Program accreditation versus institutional accreditation.

   a. Should vocational-technical or occupational education be considered part of the total college program or subject to special review?

   b. What is the role of the regional accrediting agency with respect to assessment of occupational education programs in the evaluation of the total institution?

   c. Is there overlap of function between the role of the regional accrediting agency and that of the specialized accrediting agency?

   d. Is there role confusion with respect to the fact that the specialized agency visualizes its primary goal as one of protecting the health and welfare of the public whereas the institution sees specialized accreditation as a device to increase institution and instructor prestige, to attract better students, to assist in securing funds for program operation, and as a device to assist with program improvement?

2. Proliferation.

a. Should we create new accrediting agencies or expand existing ones to consider specialized education programs. Who would coordinate this? Would there be overlapping functions among agencies?

b. The possibility of 50 state agencies adds yet another dimension -- the possibility of 50 different sets of standards and additional proliferation.

3. Costs.

a. As the number of agencies increase, and given the wide range of philosophies whereby some associations feel accreditation activities should be self-supporting and others see it as a responsibility of the association, costs to the institution in terms of application fees, dues, visitation fees, consultant honoraria, and the work load in terms of time, mount, and for the comprehensive community college with many programs this is a special burden. Examples of the variance include the American Dental Association and the American Medical Association on the one hand which neither require membership nor fees, to the National League for Nursing which does not require membership, but does charge a rather high accreditation and annual sustaining fee. For example, with some specialized accrediting agencies, the initial accrediting fees can get as high as $1,500 (whereas others charge nothing), and dues or sustaining fees can reach $575 annually (while others charge nothing). Needless to say, there is a multiplicity of arrangements given the diversity of agencies.

4. Autonomy and Uniformity.

a. There is a fear of intrusion, interference, outside domination or whatever one wishes to call it by outside agencies. It is felt that the requirements of such agencies (e.g., curricula models, staffing patterns, etc.) might put one at odds with the institution's own goals or cause a modification of these objectives (e.g., admissions policy, employment of staff, etc.).

b. In addition, some see these requirements and criteria as requiring excess uniformity and as a deterrent to innovation.

5. Evaluation Process, Standards, and Criteria

a. The approaches of the various associations and agencies are quite different. For example, occupational education is found in the comprehensive high schools, technical institutes, community colleges, four year colleges, and so forth; various agencies and associations do not agree on several jurisdictional and philosophical issues and place responsibility for accreditation of occupational programs at community colleges with different sub-groups of the agencies themselves. Indeed, the organizations doing the accrediting may or may not be autonomous of total membership and/or board of control of the parent organization. There is no common agreement on how and by whom programs in proprietary schools should be accredited and only two of the regional associations now accredit programs which do not award associate degrees.

b. There is a failure to agree among ourselves upon the relative emphasis on different features of the evaluation process.

c. Some feel that the standards for liberal arts colleges of a different era are obviously quite inappropriate for the comprehensive community college of the 20th Century and for occupational education.

d. The standards themselves may possibly be subject to legal question (for example, the American Academy McCalaster Institute of Funeral Service, Incorporated et. al. versus the American Board of Funeral Service Education, Incorporation case decision ruled against the latter which had amended its manual of accreditation standards to add a one-year college prerequisite to the minimum educational requirement for admission to mortuary science colleges and expressly excluded from this admission requirement schools which offer an integrated curriculum in funeral service education, namely university schools).

e. The whole subject of whether the criteria are too broad and general and subject to wide interpretation versus whether they are too narrow and limiting providing a strait jacket on the institution is an important and lively issue with the accountability question lurking in the background and the feeling on the part of many that specific measurable objectives and performance criteria should be used.

f. The expertise of the existing agencies and of their evaluators to judge has been called into question as well as the general issue of academic versus vocational approaches.

g. The old question about the ability to measure and evaluate quality has been raised.

6. Board membership.

a. As presently constituted, the memberships of the various regional and specialized boards have been called into question as harboring vested interests and being undemocratic because they are dominated by four-year college personnel and by the professionals respectively. It has been said that every segment of society is affected by the quality of higher education, yet the public is not adequately represented; that persons possessing expertise in occupational education are not to be found on such policy and decision making boards; that junior college educators are also not to be found; and that such boards have developed philosophies congenial to their own constiuencies. For example, one regional association finds two-year colleges making up 19 per cent of the membership of the commission on colleges, even less than the public schools' share. Another regional association finds that while two-year colleges constitute 14 per cent of the institutional membership of the Commission on Higher Education, only one of the 17 members on the commission itself is from a two-year college. In still another association only 8 per cent of the commission is made up of two-year people whereas 20 per cent of the total membership comes from that sector.

7. Governmental Participation

a. Is accountability for public monies present when accreditation is delegated to non-governmental agencies? If, in fact, the voluntary associations represent conflicts of interest and self-serving interests (by limiting entrance to the field), could a better balance be struck among voluntary and governmental approaches? If so, who would be included: high schools, professionals, regional associations, specialized agencies, government, public, etc.?

b. Who would call for new agencies when needed? Who would discipline weak agencies?

c. If the government becomes more involved, would government agencies and federal funding threaten the voluntary relationship between the institution and the accrediting agency?

d. Even if the federal government is not increasingly involved, a current delineation of the role of the federal government vis à vis the accrediting agencies is needed. Some feel we now face a national system of accreditation (for example, the Bureau of Higher Education's Accreditation and Institutional Eligibility unit has a timetable of evaluation for recognized agencies with criteria published by the Commissioner of Education, not all of which can be met by all of the existing agencies).

e. The junior colleges are particularly torn between the position of their professional association -- The American Association of Junior Colleges -- and the rather specific legislation requiring specialized accreditation approval.

I hope that throughout all of this presentation it has been clear that it is not a question of specialized versus general accreditation, but rather how the two can operate most effectively in conjunction to make accreditation a useful, social, and educational activity.

One suggestion for solution to some of the problems has been a clustering of the related programs as has occurred, for example, in the health field thanks to the leadership of the American Medical Association, the NCA, and others. For example, there are 269 health-related curricula in American junior colleges; many of these are accounted for by the 14 cooperating groups under the AMA umbrella and the Association is now supporting a 21-month study directed by William Selden to determine the criteria for accreditation.

While this would be attractive most signs seem to point to the conclusion that junior colleges, while not necessarily strongly in favor of program accreditation are more in favor of having the regional associations perform this program evaluation. The American Association of Junior College's statements of 1961, 1964, and 1967, as well as interim and formal statements, the findings of Lloyd Messersmith in his doctoral dissertation on the subject, and the 1969 study entitled "Accreditation of Vocational-Technical Curricula" by the Center for Research and Development in

Higher Education of the University of California at Berkeley, done at the request of the National Commission on Accrediting and the AAJC, all point in this direction.

The NCA proposal which is, in essence, the concept of federated activity seems appropriate. Occupational specialists and educators and junior college educators might be added to accrediting teams (for purposes of program accreditation), boards, councils, and commissions so that the whole accreditation process would reap the benefit of support and assistance from these specialized groups within the framework of the total institutional accreditation. Both the general and specialized agencies would meet their objectives: Maintenance of standards, protection to society, retention of the institutional framework, and dispelling of tension with two year colleges.

Federated activity, moreover, would provide relief from some of the problems delineated earlier in this paper: overlap of function would be kept to a minimum; proliferation would be curtailed; costs would be held down; the sources of "outside intrusion" would be limited in number for those who see the process as a threat; instead of dissipating energies, the several agencies could join together to focus on a common approach and appropriate criteria; the boards, commissions, and councils would be seen as more responsive to the many constituencies, including the public; the process would remain voluntary and non-governmental.

In the words of the American Association of Junior Colleges, "Regional accrediting associations should bear the primary responsibility for accreditation of community and junior colleges. These regional associations should examine and reformulate, where necessary, their procedures and policies so that they can evaluate total programs of community junior colleges." The AAJC, then, supported the NCA policy which emphasizes the central and important role of the regional associations.

Recent activity demonstrates the necessity for immediate attention to this possibility. To date, at least seven politically oriented organizations have adopted resolutions calling for more rapid action in the field: The Western Council of State Governments, the Board of Managers of the Council of State Governments, the National Governors Conference, the Midwest Conference of the Council of State Governments, the National Legislative Conference, and the Western Governors Conference and in November, 1969, the Board of Governors of the Council of State Governments adopted a resolution calling on its committee on Uniform Legislation to draft model state legislation to take over vocational education accrediting functions if the regionals do not show major progress.

In another context, Dr. Michael Brick, Director of the Community College Center at Teachers College, Columbia University, has said:

> "...where people refuse to decide, events will decide for them; and to allow events to decide impersonally is in itself a decision involving greater risks than offering a point of view."

In short, if the regional accrediting associations do not affirm a position in keeping with the requirements of our times, then others will step into the void, and we in the junior college movement do not wish to see this happen.

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